

Unified Global Security: The Challenge Ahead



Verifying Security Measures Evidence of Implementation

Presented by:

SSCSS Tom Falanga, New York Field Office

SCSS John Cisneros, Miami Field Office

SCSS David Landerer, New York Field Office

Unified Global Security: The Challenge Ahead



Objectives

- Understand evidence of implementation vs. evidence of documentation.
- Provide guidance to C-TPAT partners for presenting pre-validation documentation and evidence of implementation to their assigned SCSS.
- Places strong emphasis on verifying and testing the security measures that members have in place at the time of validation or revalidation.
- Provided examples of acceptable documentation which will be necessary for the verification of the C-TPAT Minimum Security Criteria.

Unified Global Security: The Challenge Ahead



Evaluating the True Value of a Supply Chain Security Program

- Evidence of implementation is a building block towards improving our partnership.
- Most security programs look much better on paper than they are in reality.
- The difference between cosmetic vs. meaningful supply chain security is in the evidence of implementation.

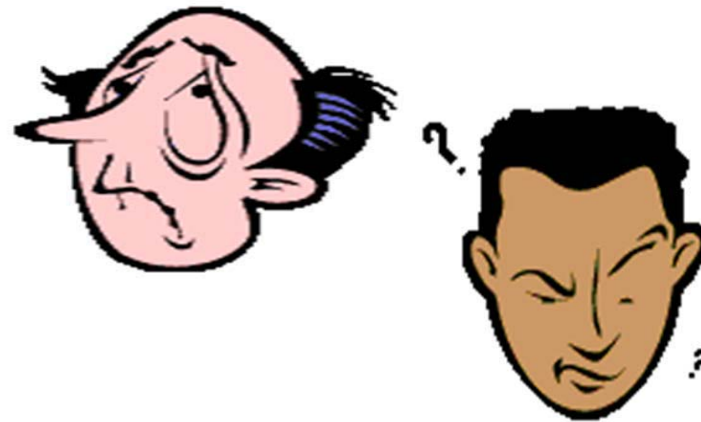
Unified Global Security: The Challenge Ahead



Supply Chain Security in a High-Risk World

Warning signs that suggest a company may be vulnerable when it comes to their security practices

- Inadequate self assessments
- Unfamiliar with current C-TPAT minimum security criteria
- Generic checklists / forms
- Complacency



Unified Global Security: The Challenge Ahead



Suspensions and Removals

January 2002 to November 1, 2012

	Importers	Foreign Manufacturers	Highway Carriers	Port/Terminal Operators	Sea/Air/ Rail Carriers	Brokers	Consolidators	Third Party Logistics Providers	Totals
Suspended Due to Validation	403	64	409	0	4	73	81	1	1035
Removed Due to Validation	339	35	273	1	2	48	38	1	737

	Importers	Foreign Manufacturers	Highway Carriers	Port/Terminal Operators	Sea/Air/ Rail Carriers	Brokers	Consolidators	Third Party Logistics Providers	Totals
Suspended Due to Incident	127	47	238	0	8	16	7	0	443
Removed Due to Incident	130	20	185	2	3	34	16	0	390

Unified Global Security: The Challenge Ahead



C-TPAT Validation: Evidence of Implementation

- Tools
- Techniques
- Expected challenges



Unified Global Security: The Challenge Ahead



Tools

- Checklists (modified to meet your company's needs)
- Secure Web Portal (C-TPAT Public Document Library)
- Supply Chain Security Specialists
- Seminars/Outreach/Training
- Employee Incentives

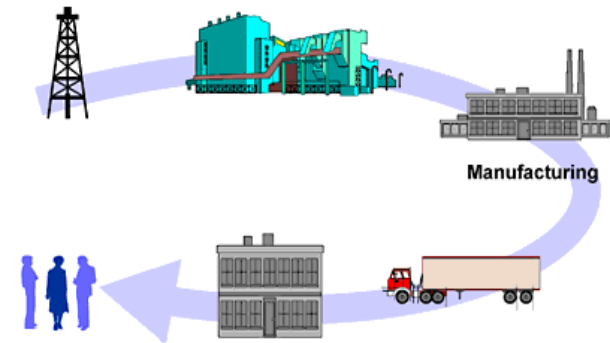


Unified Global Security: The Challenge Ahead



Techniques

- Tracking shipments
- Tabletop/Staged exercise
- Testing effectiveness and consistency is site specific
- Observation
- Interviews

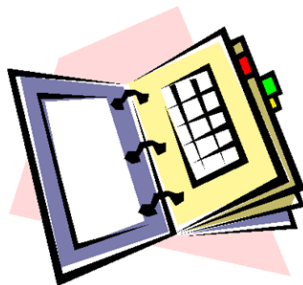


Unified Global Security: The Challenge Ahead



Expected Challenges

- Proof of implementation
- Prepared response
- Site tour
- Knowledge of procedures



Unified Global Security: The Challenge Ahead



Acceptable Evidence of Implementation

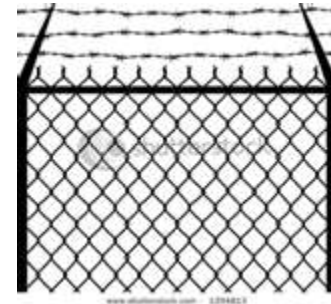
- Documentation
 - Conveyance Inspections Checklists
 - Business Partner Security Questionnaires
 - H/R Checklists.
- Photographic/Video evidence.
- Demonstration



Unified Global Security: The Challenge Ahead

Preparation of Evidence

- Provide copies of the documented policies and procedures.
- Be prepared for your SCSS to verify processes and practices relevant to container inspections.
- Demonstration of your automated systems.
- Demonstrate physical security measures.



Unified Global Security: The Challenge Ahead



Matrix Introduction

	Documented Procedures	EVIDENCE OF IMPLEMENTATION	How far back did you go?
Risk Assessment	<input type="checkbox"/> Document/checklist/form <input type="checkbox"/> None <input type="checkbox"/> WRITTEN PROCEDURES <input type="checkbox"/> Documentation uploaded in portal <input type="checkbox"/> Other _____	<input type="checkbox"/> Reviewed and obtained copy of procedures/documentation/files <input type="checkbox"/> Reviewed procedures/documentation/files - no copy obtained <input type="checkbox"/> Observed process / site tour <input type="checkbox"/> Photo evidence / document scanned <input type="checkbox"/> Explanation of compliance by management / department employee	<input type="checkbox"/> Current week _____ <input type="checkbox"/> 1-6 months _____ <input type="checkbox"/> 6-12 months _____ <input type="checkbox"/> Over 12 months _____
Business Partners	<input type="checkbox"/> Document/checklist/form <input type="checkbox"/> None <input type="checkbox"/> WRITTEN PROCEDURES <input type="checkbox"/> Documentation uploaded in portal <input type="checkbox"/> Other _____	<input type="checkbox"/> Reviewed and obtained copy of procedures/documentation/files <input type="checkbox"/> Reviewed procedures/documentation/files - no copy obtained <input type="checkbox"/> Observed process / site tour <input type="checkbox"/> Photo evidence / document scanned <input type="checkbox"/> Explanation of compliance by management / department employee	<input type="checkbox"/> Current week _____ <input type="checkbox"/> 1-6 months _____ <input type="checkbox"/> 6-12 months _____ <input type="checkbox"/> Over 12 months _____
Conveyance Security Inspection	<input type="checkbox"/> Document/checklist/form <input type="checkbox"/> None <input type="checkbox"/> WRITTEN PROCEDURES <input type="checkbox"/> Documentation uploaded in portal <input type="checkbox"/> Other _____	<input type="checkbox"/> Reviewed and obtained copy of procedures/documentation/files <input type="checkbox"/> Reviewed procedures/documentation/files - no copy obtained <input type="checkbox"/> Observed process / site tour <input type="checkbox"/> Photo evidence / document scanned <input type="checkbox"/> Explanation of compliance by management / department employee	<input type="checkbox"/> Current week _____ <input type="checkbox"/> 1-6 months _____ <input type="checkbox"/> 6-12 months _____ <input type="checkbox"/> Over 12 months _____
Physical Access Controls	<input type="checkbox"/> Document/checklist/form <input type="checkbox"/> None <input type="checkbox"/> WRITTEN PROCEDURES <input type="checkbox"/> Documentation uploaded in portal <input type="checkbox"/> Other _____	<input type="checkbox"/> Reviewed and obtained copy of procedures/documentation/files <input type="checkbox"/> Reviewed procedures/documentation/files - no copy obtained <input type="checkbox"/> Observed process / site tour <input type="checkbox"/> Photo evidence / document scanned <input type="checkbox"/> Explanation of compliance by management / department employee	<input type="checkbox"/> Current week _____ <input type="checkbox"/> 1-6 months _____ <input type="checkbox"/> 6-12 months _____ <input type="checkbox"/> Over 12 months _____

Unified Global Security: The Challenge Ahead



Evidence of implementation / Verification of Security Measure Risk Assessment

- Uploaded written risk assessment standard operating procedure into the C-TPAT portal outlining the company's program.
- Upload populated audit sheets (internal, business partner, etc.) and documented risk assessments of business partners.
- Be prepared to present and explain in detail all written material and forms covering the company's Risk Assessment Process at the time of the validation or revalidation.

Unified Global Security: The Challenge Ahead



Evidence of Implementation / Verification of Security Measure

Business Partner Screening

- Upload a thorough written business partner screening standard operating procedure into the C-TPAT portal outlining the company's process.
- Upload populated business partner questionnaires, correspondence from business partners providing SVI numbers.
- Be prepared to fully explain the company's business partner screening process, for both C-TPAT and non-C-TPAT partners.
- Be prepared to present evidence of monitoring SVI numbers.

Unified Global Security: The Challenge Ahead



Evidence of Implementation / Verification of Security Measure

Trailer Security / Seals

- Upload written trailer security and seal control procedures into the C-TPAT portal.
- Upload a manufacturer's high security seal specification sheet..
- Upload a populated conveyance security inspection worksheet.
- Be prepared to demonstrate the conveyance inspection to the SCSS during the visit.
- Be prepared to submit populated high security seal log sheets and other documents at the visit.

Unified Global Security: The Challenge Ahead



Evidence of Implementation / Verification of Security Measure

Procedural Security

- Upload any written procedural security measures explaining data integrity and information reporting security measures. Be prepared to provide proof of these measures to the SCSS at the time of visit.
- Upload a driver's arrival log into the C-TPAT portal (importers, foreign manufactures and highway carriers).
- Upload written procedures that reveals how the entity notifies CBP and/or law enforcement if illegal activity is detected.

Unified Global Security: The Challenge Ahead



Evidence of Implementation / Verification of Security Measure

Physical Security

- Upload images of fences, alarm and video surveillance system into the C-TPAT portal.
- Upload all documented inspections (fences, structure, lighting, locking devices, etc.)
- Be prepared to show SCSS the perimeter fencing, structural security devices, gates, alarm and video surveillance system at the time of the visit.

Unified Global Security: The Challenge Ahead



Evidence of Implementation / Verification of Security Measure

Access Controls

- Upload security guard logs into the C-TPAT portal.
- Upload populated visitor / vendor log sheets into the C-TPAT portal.
- Upload populated access control log sheets (keys, access control cards, etc.)
- Upload written Access Termination procedures and termination checklists into the C-TPAT portal.
- Be prepared to submit additional documentation during the visit.

Unified Global Security: The Challenge Ahead



Evidence of Implementation / Verification of Security Measure

Personnel Security

- Upload written company screening process for prospective employees into the C-TPAT portal.
- If applicable, due to security and privacy issues, be prepared to show proof of contents in employee's personnel file.
- Upload written contracts between third party hiring or investigative agencies.
- Be prepared to provide proof of background investigations for contactors and temporary employees at the time of the visit.

Unified Global Security: The Challenge Ahead



Evidence of Implementation / Verification of Security Measure Security Training / Threat Awareness

- Upload any written company security training / threat awareness procedures.
- Upload training PowerPoints into the C-TPAT portal.
- Upload evidence of documented employee training.
- Be prepared to provide security threat reporting procedures to the SCSS at the time of visit.

Unified Global Security: The Challenge Ahead



Evidence of Implementation / Verification of Security Measure

Information Technology Security

- Upload written company IT policies, procedures and standards into the C-TPAT portal.
- Be prepared to provide proof of employee IT security training to the SCSS at the time of visit.
- Be prepared to provide a demonstration of IT security system capabilities.
- Be prepared to provide proof of implemented company IT disciplinary policy.

Unified Global Security: The Challenge Ahead



Evidence of Implementation / Verification of Security Measure

FAST Transponder Controls

- Upload written documented procedures the company has in place to manage the ordering, issuance, activation and deactivation of FAST transponders.
- Be prepared to demonstrate how the highway carrier protects transponders from misuse, tampering, theft and alteration to the SCSS at the time of the visit.

Unified Global Security: The Challenge Ahead



Evidence of Implementation Checklists and Forms

Final Pay Check List

Employee Name: _____

Employee #: _____

	Done?
1 Complete Termination Report	
2 Fill Out ROE Request Form	
3 Remove from Seniority List	
4 Remove from Job Chart	
5 Add to Payroll Adjustments Spreadsheet	
6 Fax MSP to Remove from Benefits (copy in binder)	
7 Fax JEMS to Remove from Benefits (copy in binder)	
8 Add to MSP/Benefit Spreadsheet	
9 Print off hours from TimeZone	
10 Print off last pay stub from Insync	
11 Pay Out Banked Overtime	
12 Fill out Final Pay Worksheet	
13 Check for any Advances/XD	
14 Remove from R.R.S.P. Spreadsheet	
15 Find Tool Sheet - are they returned?	
16 Highlight in Attendance Tracking System	
17 Attach any letter of resignation	
18 I.D. Badge Returned and Cancelled	
19 Move Employee picture to Terminated folder	
20 Remove from Training Matrix	
21 Remove sheet from First-Aid binder	
22 Add Payroll Cheque Request form	
23 Have Authorizing Signature on it	
24 Submit to A/P for Cheque	

G:\Info & Adj\Forms\Final Pay Check List

Blank forms are not proof that a practice or procedure has been implemented !

All forms that are claimed to be part of a entity's process must be uploaded into the C-TPAT portal and must be current data.

Unified Global Security: The Challenge Ahead



Verification of Security Measures

Written Procedures

- Generic written procedures are not acceptable proof that C-TPAT criteria is being implemented by the entity.
- If it is stated in a written procedure, BE PREPARED to provide proof of implementation.
- Verbal statements are no longer accepted as proof of implementation!

Unified Global Security: The Challenge Ahead



Management Oversight and Accountability



- Evidence of continued management support (checks and balances).
- Periodic management review of security processes and measures (security assessment).
- Verifying procedures to investigate security related issues (incidents and breaches).

Unified Global Security: The Challenge Ahead



Questions?

- Contact your assigned SCSS via phone, portal, or email
 - Contact your SCSS' field office:
 - JFK Field Office (718) 553-2745
 - Miami Field Office (305) 471-8080
 - Buffalo Field Office (716) 626-6470
 - Newark Field Office (908) 353-6818
 - Washington D.C. (202) 344-1180
 - Los Angeles Field Office (562) 366-3280

Email: industry.partnership@dhs.gov

Unified Global Security: The Challenge Ahead



Unified Global Security: The Challenge Ahead

